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Of Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANJAY KAUSHIK,

Defendant.

Case No. 3:24-CR-00439-IM

DEFENDANT'S UNOPPOSED  
MOTION FOR POSTPONEMENT OF  
TRIAL DATE

Defendant, Sanjay Kaushik, through his attorney Per C. Olson, moves this Court for an order postponing the trial date in this case for approximately 120 days from May 20, 2025 to September 16, 2025 or a date thereafter convenient to the Court. Mr. Kaushik has been advised of the need for the continuance and has authorized counsel to represent he has no objection to the continuance with the knowledge that the time frame is excludable under the Speedy Trial Act. The time frame of the requested continuance is excludable from Speedy Trial computations pursuant to 18 U.S.C. § 3161(h)(7)(A), and the ends of justice served by the granting of the continuance outweigh the interests of the public and the defendant in a speedier trial.

Assistant United States Attorney Gregory Nyhus does not oppose this request.

This motion is supported by the attached Declaration of Per C. Olson.

DATED this 22<sup>nd</sup> day of April, 2025.

HOEVET OLSON, PC

s/ Per C. Olson  
Per C. Olson, OSB #933863  
Of Attorneys for Defendant